

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ADAM PLETCHER,
SAMANTHA PLETCHER,

Plaintiffs,

Case No: 20-cv-811

v. .

SPARKPLUG CAPITAL LLC,

Defendant.

DEFENDANT’S, SPARKPLUG CAPITAL, LLC, LAY AND EXPERT WITNESS LIST

Defendant, Sparkplug Capital LLC (“Sparkplug”), by its attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, hereby reserves the right to call the following lay and witnesses to testify at the time of trial:

LAY/NON-RETAINED EXPERT WITNESSES

1. Representatives, past employees, and present employees of Sparkplug, including, but not limited to, the following individuals may be called to render testimony at trial.
 - a. Kurt Bottlemy –Facility Supervisor. Mr. Bottlemy has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify regarding his role in his capacity as a Facility Supervisor and topics such as maintenance procedures and processes.
 - b. Robert Vanderploeg - Director of Field Operations. Mr. Vanderploeg has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify

regarding his role in his capacity as Director of Field Operations and topics such as maintenance procedures and processes.

- c. Chad Lewis - Vice President of Operations. Mr. Lewis has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify regarding his role in his capacity as Vice President of Operations and topics such as Sparkplug's corporate structure.
- d. Jen Keane - Director of Asset Management. Ms. Keane has been deposed in this action. It is anticipated that she will testify consistent with her deposition testimony on the subjects inquired. She is further expected to testify regarding her role in her capacity as Director of Asset Management and topics such as Sparkplug's corporate structure and acquisitions.
- e. Seth Bent – Previously CEO. Mr. Bent has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify regarding his role when he was the CEO and topics such as creating Sparkplug and processes and procedures of acquisitions.

2. Molly Coyle – Owner of 1900 A.D., LLC. Ms. Coyle has been deposed in this action. It is anticipated that she will testify consistent with her deposition testimony on the subjects inquired. She is further expected to testify regarding 1900 A.D., LLC's maintenance processes and procedures when it owned the subject storage facility.

3. Tanner Hughes – Owner of Hughes Property Services, LLC. Mr. Hughes been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony

on the subjects inquired. He is further expected to testify regarding his experience in maintenance and repair of garage doors, including spring repair.

RETAINED EXPERT

4. Damon Kaplanek – Owner, Damon Doors & Loading Dock Equipment, LLC. Mr. Kaplanek will be called to give testimony regarding his knowledge and experience regarding installation and maintenance of overhead garage doors, including those used at mini storage facilities, and mini storage facility industry standards for maintenance and repair of garage doors. Mr. Kaplanek may give opinions relative to the reasonableness of the procedures followed in regards to mini storage facility maintenance and repairs and maintenance of the mini storage facility, particularly overhead garage doors, and the unit at issue. Mr. Kaplanek's report is attached hereto and marked as Exhibit A.

5. Any and all witnesses named by Plaintiffs or revealed through further discovery.

6. Any and all witnesses necessary to offer rebuttal testimony.

Sparkplug expressly reserves the right to supplement and/or amend this Lay and Expert Witness List up to and during the trial of this action based on further discovery and pursuant to testimony that may be introduced at trial.

Dated this 28th day of May, 2021.

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER, LLP**
Attorneys for Defendant, Sparkplug Capital LLC

/s/ Kevin A. Christensen
Kevin A. Christensen
State Bar No.: 1011760
Kevin.Christensen@wilsonelser.com
Andrea G. Jahimiak
State Bar No.: 1115348
Andrea.Jahimiak@wilsonelser.com
Phone: 414-276-8816

P.O. Address

555 E. Wells St., Ste. 1730
Milwaukee, WI 53202